

Appendix A

Responses to Source Water Assessment Program Public
Comments - December, 1997

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Comments from Fond du Lac public meeting

1. "Will all communities using a surface water source have to do individual assessments, i.e. Lake Winnebago?"

Source water delineations and assessments will be done for all communities with public water supplies, including those using Lake Winnebago water. The DNR plans to coordinate assessments so that individual communities using water from the same source area will not duplicate assessment efforts.

2. "How far upstream must the assessment go?"

The U.S. Environmental Protection Agency (EPA) has stated that for public water systems (PWSs) relying on surface water, the Source Water Protection Areas (SWPA) will "include the entire watershed area upstream of the PWS's intake structure...up to the boundary of the state borders." As recommended by EPA, topographic boundaries will be used to delineate the SWPAs.

3. "How will information from far ends of the Lake Winnebago system get to the surface systems on the lake?"

Information on potential contamination sources will be collected for the entire Lake Winnebago watershed for the surface water systems on the lake. The information will be made available to all systems using Lake Winnebago water.

4. "Needs to be a coordinated effort base on information sharing between wellhead protection districts and source water assessment requirements."

EPA guidance emphasizes coordinating source water protection efforts with other programs, especially wellhead protection. The DNR intends to use our existing wellhead protection program as the basis for the source water assessment program for systems using groundwater. Delineations and wellhead protection plans already completed will be used for source water assessments.

5. "What type of money are we talking about to get a GIS system of this type up and running?"

The DNR estimates that the costs for upgrading the existing GIS system to meet the needs for statewide source water assessments to approach several hundred thousand dollars for GIS equipment, a dedicated server and computers alone. Total data management costs including the above, staff and training costs will exceed that amount.

6. "It's impossible to know what to consider in a source water assessment - bridges are sources of spills, airplanes can fall in the water - we need to limit consideration to realistic threats."

The DNR plans to limit source water assessments to threats from potential sources of contamination that can be located and mapped. It is possible to identify significant potential

sources of contamination as has been done for the Wellhead Protection and Vulnerability Assessment Programs. The examples cited above fall into the realm of contingency planning, the Spill Response Program or the Emergency Response Program, not the source water assessment program.

Comments from Madison

1. "Will I have to hire a consultant now to do this assessment?"

No. The responsibility for completing the assessments is with the State. If there is enough interest from communities in doing their own assessments or hiring consultants to do their assessments then the DNR may choose to write contracts with those communities to complete the assessments.

2. "Noncommunity systems will use 1200 foot radius - how about community systems?"

Methodologies for doing source water delineations for systems using groundwater have not been finalized. Presently, some options for community systems include a half-mile radius and a calculated fixed radius delineation with a 1200 foot minimum. Some options for non-community systems include a calculated fixed radius delineation with a 1200 foot minimum, a 1200 foot fixed radius, or a fixed radius of less than 1200 feet.

3. "How long will we have to finish our assessments?"

The EPA has given the states two years with a possible extension of 18 months from when the state's program plan is approved. Assuming EPA approval by the deadline of November 6, 1999, we would have until November 6, 2001 without the extension and until May 6, 2003 with the extension.

4. "How will municipalities gain the power to exercise control over all possible sources of contamination if after assessment the feds require that they take action on possible contamination sources?"

USEPA Source Water Assessment and Protection Program guidance requires no such action. It is unlikely that municipalities will gain jurisdiction to control all potential sources of contamination (PSC). However, through cooperation at the county level it is possible to have some control over PSCs outside of the municipalities boundaries.

5. "How much land could be purchased to protect source water?"

Wisconsin will have the option of using up to \$4.15 million for loans to public water systems to acquire land or a conservation easement for the purpose of protecting source water of the system. These loans must be intended to foster compliance with national primary drinking water regulations, and to significantly enhance the protection of public health. Alternatively, this money can be used for source water area delineations and assessments, capacity development, wellhead protection and/or several other activities. The DNR will find out what public interest exists in using funds for loans for land purchases before determining how much of the funding will be used for loans for land and conservation easement purchases.

6. “I can’t see why Wisconsin would want to spend money on a program like source water assessment when surface water treatment plants are designed and operated in a manner to remove those contaminants and are doing a very good job at it.”

Source water assessments are designed to be part of a multiple barrier approach targeted at all public water systems. Many public water systems in Wisconsin use minimally treated or untreated groundwater and rely on good quality intake water. For systems with treatment plants, limited accuracy in sampling, mechanical failure or human error can all result in adverse consequences to public health where adequate prevention efforts are lacking. Treatment failure resulted in a widespread *Cryptosporidium* outbreak and deaths in Milwaukee. Treatment costs also increase with source water contamination. To account for treatment effectiveness contaminants that are easily treated for may be given a lower priority in source water assessments.

Comments from Eau Claire

1. “WI has such a variety of non-point pollution seasonal ~ work closely with the DATCP”

The DNR will work closely with DATCP on non-point source pollution concerns. Additionally, the DNR’s Runoff Management Section will be involved in the development and implementation of the SWAP.

2. “Public Notification Requirements for larger and smaller systems - alarming people unnecessarily?”

The SDWA requires that the results of the source water assessments be made available to the public. This is not the same as “Public Notification” that is issued for drinking water quality violations. The assessments will identify potential sources of contamination for each public water system. Public availability of the assessment results are not intended to alarm people but rather are intended to have educational benefits and foster local involvement in drinking water protection.

3. “Combine Operator Certification/Capacity Development/ Source Water Assessment.”

The Operator Certification and Capacity Development components of the SDWA will be developed after the SWAP has been developed. SWAP goals will be incorporated into Operator Certification and Capacity Development programs as they are developed.

4. “Duplication of efforts.”

Every effort will be made not to duplicate efforts. The DNR will achieve source water protection goals by using numerous existing programs such as Wellhead Protection, Comprehensive State Ground Water Protection, and the Watershed Approach. Information from other state departments (DOT, DATCP, COMM), Federal Agencies (USGS, EPA, USDA), and local governments will be utilized in the assessments. Coordination among the various programs will be a key part of Source Water Assessment and Protection activities.

Other Comments

1. “Source Water Assessment training should be included in Operator training.”

The Operator Certification component of the SDWA will be developed after the SWAP has been developed. SWAP goals will be incorporated into the Operator Certification programs as they are developed.

2. “Public Notification is a/the critical issue in this process. The manner in which this information is released will have a large impact on how it is perceived and possibly acted upon. Need to consider all outcomes before establishing public notice format. “Remember the Pb and Cu Notices.””

The SDWA requires that the results of the source water assessments be made available to the public. This is not the same as “Public Notification” that is issued for drinking water quality violations. The assessments will identify potential sources of contamination for each public water system. Public availability of the assessment results are not intended to alarm people but rather are intended to have educational benefits and foster local involvement in drinking water protection.

3. “Coordination with other DNR Regional Programs.”

Integration and Coordination with existing programs will be a high priority in developing the Source Water Assessment Program (SWAP). Wellhead protection, vulnerability assessments and sanitary surveys will all be elements of the SWAP and require coordination at the Regional level.

4. “Beginning “Social Engineering Program” - Many individual ordinances. Regulation of what can or cannot be built.”

Safe drinking water is essential to the quality of community life because of the link between public health and the quality of the public water supply. Protecting public drinking water supplies is key in maintaining the development of communities. Source water assessments are designed to be part of a multiple barrier approach targeted at all public water systems. Many public water systems in Wisconsin use minimally treated or untreated groundwater and rely on good quality intake water. For systems with treatment plants, limited accuracy in sampling, mechanical failure or human error can all result in adverse consequences to public health where adequate prevention efforts are lacking. Treatment failure resulted in a widespread *Cryptosporidium* outbreak and deaths in Milwaukee. Treatment costs also increase with source water contamination. Source Water Protection makes sense for both the short term health and the long-term prosperity of a community.

5. “Questions regarding Surface Waters: Watershed Organizations (have) a lot of information already.”

Every effort will be made not to duplicate efforts. The DNR will achieve source water protection goals by using numerous existing sources of information from other state departments (DOT, DATCP, COMM), Federal Agencies (USGS, EPA, USDA), local governments and watershed organization for source water area assessments. Coordination among the various programs and integration of existing information will be key parts of Source Water Assessment and Protection activities.

6. “Most SW plants are designed to address contaminants - Not too much effort (\$) for surface waters.”

Source water assessments are designed to be part of a multiple barrier approach targeted at all public water systems. Many public water systems in Wisconsin use minimally treated or untreated groundwater and rely on good quality intake water. For systems with treatment plants, limited accuracy in sampling, mechanical failure or human error can all result in adverse consequences to public health where adequate prevention efforts are lacking. Treatment failure resulted in a widespread *Cryptosporidium* outbreak and deaths in Milwaukee. Treatment costs also increase with source water contamination. To account for treatment effectiveness contaminants that are easily treated for may be given a lower priority in source water assessments.

7. "For large watersheds which may require several communities to duplicate efforts, set aside money to encourage communities to work together to complete assessment."

In instances where source water areas overlap such as in surface water systems with common watersheds, groundwater systems within those watersheds, or overlapping groundwater source water areas, assessment information will be utilized in the most efficient way possible. Source water funding will be utilized to coordinate source water area assessments and assure that efforts are not duplicated.

8. "Take full set-aside."

The DNR intends to take the full 10 percent set aside allowed for source water delineations and assessments. This money is automatically returned to the Drinking Water State Revolving Fund if it is not used for the delineations and assessments so there is no risk associated with taking the full 10 percent

9. "We're already doing this with a "Wellhead Protection" groundwater protection plan. This would only duplicate more of what is being done."

Integration and Coordination with existing programs will be a high priority in developing the Source Water Assessment Program (SWAP). Wellhead protection, vulnerability assessments and sanitary surveys will all be elements of the SWAP and require coordination at the Regional level.

10. "Watersheds already exist at the Department ? (GIS)"

Watershed boundaries are already delineated and digitized in the DNR Geographic Information System. This data layer will be utilized for source water area delineations.

11. "Winnebago/Communities working together/duplication"

In instances where source water areas overlap such as for surface water systems located in the Lake Winnebago system and for groundwater systems within the Lake Winnebago watershed or where groundwater system source water protection areas overlap, assessment information will be utilized in the most efficient way possible. Source water funding will be utilized to coordinate source water area assessments and assure that efforts are not duplicated.

12. "Zebra Mussels?"

Zebra Mussels do not appear to be a significant problem in protecting source water. The organisms, which are filter feeders have the effect of filtering out contaminants from the water.

Sometimes Zebra Mussels can clog surface water intakes, but this is treatable and does not usually cause a water quality problem. DNR staff with knowledge of Zebra Mussel issues are involved in Source Water Assessment Program development and will advise as to how to address problems if they arise.

13. “Inorganics/Organics? Both & regulated; crypto etc.”

The DNR will complete a potential source of contamination inventory for all SWPAs. Contaminants of concern will include all substances with a MCL, contaminants regulated under the Surface Water Treatment Rule, and the microorganism *Cryptosporidium*. Other contaminants that the DNR determines may present a threat to public health may be included.

14. “How much money will it take to construct GIS information & data systems?”

The DNR estimates that the costs for upgrading the existing GIS system to meet the needs for statewide source water assessments to approach several hundred thousand dollars for GIS equipment, a dedicated server and computers alone. Total data management costs including the above, staff and training costs will exceed that amount.

15. “Overlap of GW well delineations and surface water delineations”

In instances where source water areas overlap such as in surface water systems with common watersheds, groundwater systems within those watersheds, or overlapping groundwater source water areas, assessment information will be utilized in the most efficient way possible. Source water funding will be utilized to coordinate source water area assessments and assure that efforts are not duplicated.

16. “Coordinate with other agencies”

Every effort will be made not to duplicate efforts. The DNR will achieve source water protection goals by using numerous existing sources of information from other state departments (DOT, UWEX, DATCP, COMM, DHFS, DOA), Federal Agencies (USGS, EPA, USDA), local governments and watershed organization for source water area assessments. Coordination among the various programs and integration of existing information will be key parts of Source Water Assessment and Protection activities.

17. “Ever affected by sources? Primary look - bridges; ag.us; prioritize contaminant sources; worry about local sources.”

The DNR plans to limit source water assessments to threats from potential sources of contamination that can be located and mapped. It is possible to identify significant potential sources of contamination as has been done for the Wellhead Protection and Vulnerability Assessment Programs. Some potential sources fall into the realm of contingency planning, the Spill Response Program or the Emergency Response Program, not the source water assessment program.

18. “Coordination within other states.”

The USEPA has and will continue to provide opportunities to meet with other states to discuss source water protection goals and implementation strategy. We plan to work closely with other

states to assure source protection of public water systems with source water areas in neighboring states, especially systems with intakes in the Great Lakes. Contacts have been made with state staff in Illinois, Michigan and Minnesota regarding common source water areas. In the interest of learning from others, contacts have also been made with other states who are developing and implementing source water assessment programs similar to Wisconsin's.

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